

Anthony J. Sylvester
SHERMAN WELLS SYLVESTER & STAMELMAN LLP
210 Park Avenue, 2d Floor
Florham Park, NJ 07932
(973) 302-9700
asylvester@shermanwells.com

Sean M. Murphy (*pro hac vice*)
Robert C. Hora (*pro hac vice*)
MILBANK, TWEED, HADLEY & McCLOY LLP
28 Liberty Street
New York, NY 10005
(212) 530-5000

*Attorneys for Defendants Hartford Investment Financial Services, LLC
and Hartford Funds Management Company, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENNIFER L. KASILAG, LOUIS MELLINGER,
JUDITH M. MENENDEZ, JACQUELINE M.
ROBINSON, and LINDA A. RUSSELL, *et al.*,
Plaintiffs,

vs.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil Action No. 11-cv-1083 (RMB)(KMW)

and

Civil Action No. 14-cv-1611 (RMB)(KMW)

JENNIFER L. KASILAG, LOUIS MELLINGER,
JUDITH M. MENENDEZ, JACQUELINE M.
ROBINSON, LINDA A. RUSSELL, DENNIS
RUSSELL, AND DARIN DUDEK, ON BEHALF OF
AND FOR THE BENEFIT OF THE HARTFORD
HEALTHCARE FUND, THE HARTFORD
CONSERVATIVE ALLOCATION FUND, THE
HARTFORD GROWTH OPPORTUNITIES FUND,
THE HARTFORD INFLATION PLUS FUND, THE
HARTFORD BALANCED FUND, THE
HARTFORD CAPITAL APPRECIATION FUND,
THE HARTFORD FLOATING RATE FUND, AND
THE HARTFORD SMALL COMPANY FUND
Plaintiffs,

vs.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
SEALING IN CONNECTION WITH THE
PARTIES' SUMMARY JUDGMENT
OPPOSITION AND REPLY PAPERS**

Defendants Hartford Investment Financial Services, LLC and Hartford Funds Management Company, LLC, and Plaintiffs Jennifer L. Kasilag, Louis Mellinger, Judith M. Menendez, Jacqueline M. Robinson, Linda A. Russell, Dennis Russell, and Darin Dudek (“Plaintiffs”), (together the “Parties”), through their undersigned counsel, hereby respectfully submit this Stipulation and [Proposed] Order Regarding Sealing In Connection With Parties’ Summary Judgment Opposition and Reply Papers (the “Stipulation”).

WHEREAS, on June 5, 2015, Plaintiffs filed a Motion for Partial Summary Judgment and Defendants filed a Motion for Summary Judgment (together, the “Summary Judgment Motions”) (ECF Nos. 143,144);¹

WHEREAS, in order to address challenges arising from the inclusion of information designated confidential in the parties’ Summary Judgment Motions and related papers, the Summary Judgment Motions were temporarily filed under seal, pursuant to this Court’s text order (ECF No. 142), with Defendants’ required to file a motion to seal with respect to any information they sought to protect in either parties’ filing within 10 days of the filings;

WHEREAS, on June 15, 2015, consistent with this Court’s order, Defendants filed a Motion to Seal Internal Cost and Non-Public Profitability Information (the “Motion to Seal”) in the Summary Judgment Motions (ECF No. 148);

WHEREAS, the Parties are preparing their respective responses in opposition to the Summary Judgment Motions and related Rule 56.1 statements (the “Summary Judgment Oppositions”), which will be filed on July 22, 2015;

WHEREAS, the Parties’ respective replies in support of their Summary Judgment Motions (the “the Summary Judgment Replies”) are scheduled to be filed on August 21, 2015;

¹ References to docket numbers (*i.e.*, “ECF No. ____”) are to the docket in *Kasilag v. Hartford Inv. Servs., LLC*, No. 11-01083 (D.N.J. Nov. 14, 2011).

WHEREAS, the Parties expect that the Summary Judgment Oppositions and Summary Judgment Replies will, in part, contain the same type of information that is the subject of Defendants' existing Motion to Seal (*i.e.*, cost and profitability information);

WHEREAS, Defendants will seek to seal such information for the same reasons already identified in their Motion to Seal;

WHEREAS, Plaintiffs anticipate that they will oppose the sealing of such information for the same reasons already identified in their Opposition to the Motion to Seal (ECF No. 159);

WHEREAS, to avoid filing duplicative motions to seal regarding the same type of information already subject to the existing Motion to Seal, the parties have met and conferred. The parties agree, subject to the Court's approval, that for the sealing process related to their Summary Judgment Oppositions and Summary Judgment Replies: (i) the parties will file their Summary Judgment Oppositions and Summary Judgment Replies temporarily under seal, and (ii) within 10 days of each filing, Defendants will file supplemental proposed orders in connection with the existing Motion to Seal, identifying any additional information (of the same type covered by the existing Motion to Seal) from the Summary Judgment Oppositions and Summary Judgment Replies that Defendants wish to seal.

WHEREAS, the Parties further agree, to the extent that the parties file any new categories of confidential information in their responses and replies that are not already within the scope of the Motion to Seal, the party seeking to seal any such information will file a motion to seal that new information within 10 days of the filing of the Summary Judgment Oppositions and Summary Judgment replies;

NOW, THEREFORE, the Parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. The Parties' Summary Judgment Oppositions shall be temporarily filed under seal on July 22, 2015;
2. The Parties' Summary Judgment Replies shall be temporarily filed under seal on August 21, 2015;
3. Within 10 days of each of these filings, Defendants will file supplemental proposed orders in connection with their existing Motion to Seal, identifying any additional information (of the same type covered by the existing Motion to Seal) from the Summary Judgment Oppositions and Summary Judgment Replies that Defendants wish to seal;
4. To the extent that the parties file any new categories of confidential information in their Summary Judgment Oppositions and Summary Judgment Replies that are not already within the scope of the existing Motion to Seal, the party seeking to seal any such information will file a motion to seal that new information within 10 days of the filing of the Summary Judgment Oppositions and Summary Judgment Replies;

Dated: July 17, 2015

Respectfully submitted,

By: /s/ Robert L. Lakind
Robert L. Lakind
SZAFTERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
(609) 275-0400

By: /s/ Anthony J. Sylvester
Anthony J. Sylvester
SHERMAN WELLS SYLVESTER &
STAMELMAN LLP
210 Park Avenue, 2d Floor
Florham Park, NJ 07932
(973) 302-9700

ZWERLING, SCHACHTER &
ZWERLING, LLP
Jeffrey C. Zwerling
Robin F. Zwerling
Susan Salvetti
Andrew W. Robertson
41 Madison Avenue
New York, NY 10010
(212) 223-3900


Attorneys for Plaintiff

MILBANK, TWEED, HADLEY & McCLOY
LLP
Sean M. Murphy (*pro hac vice*)
Robert C. Hora (*pro hac vice*)
28 Liberty Street
New York, NY 10005
(212) 530-5000

*Attorneys for Defendants Hartford Investment
Financial Services, LLC
and Hartford Funds Management Company,
LLC*

SO ORDERED.

July 21st, 2015

A handwritten signature in black ink, appearing to read "Renee Marie Bumb", written over a horizontal line.

Hon. Renee Marie Bumb, U.S.D.J.
District of New Jersey